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8 Bona Fide Conglomerate, Inc.

9
10 UNITED STATES DISTRICT COURT
11 SOUTHERN DISTRICT OF CALIFORNIA

12 BONA FIDE CONGLOMERATE, INC.,

13 Plaintiff,

14 v.

15 SOURCEAMERICA, et al.,

16 Defendants.

Case No.: 14cv0751 GPC (AGS)

**DECLARATION OF JOSEPH T.
ERGASTOLO IN OPPOSITION TO
DEFENDANT'S MOTION FOR
SUMMARY JUDGMENT OR,
ALTERNATIVELY, PARTIAL
SUMMARY JUDGMENT**

17 Date: September 21, 2018

18 Time: 1:30 p.m.

Judge: Hon. Gonzalo P. Curiel

19 Courtroom: 2D (Schwartz)

20 AND RELATED COUNTERCLAIMS

21 I, Joseph T. Ergastolo, declare:

22 1. I am an attorney at law licensed to practice before this Court and am a
23 partner in the law firm of Wright, L'Estrange & Ergastolo, counsel of record for
24 Plaintiff Bona Fide Conglomerate, Inc. ("Bona Fide"), in the above-entitled matter.
25 The facts contained within this declaration are true of my own knowledge and are
26 such that I could, and would if called upon to do so, competently testify thereto.

1 2. Attached to this declaration as Exhibit A are true and correct copies of
2 select excerpts of the transcript of the deposition of Nancy Yoder, taken on June 21,
3 2018, and select exhibits referenced therein.

4 3. Attached to this declaration as Exhibit B are true and correct copies of
5 select excerpts of the transcript of the deposition of Martin Williams, taken on May
6 30, 2018, and select exhibits referenced therein.

7 4. Attached to this declaration as Exhibit C are true and correct copies of
8 select excerpts of the transcript on the deposition of Joseph Diaz, taken on May 22 and
9 23, 2018, and select exhibits referenced therein.

10 5. Attached to this declaration as Exhibit D are true and correct copies of
11 select excerpts of the transcript of the deposition of Thomas Eugene Hawkins, taken
12 on June 5, 2018, and select exhibits referenced therein.

13 6. Attached to this declaration as Exhibit E are true and correct copies of
14 select excerpts of the transcript of the deposition of Michael Vrobel, taken on June 22,
15 2018, and select exhibits referenced therein.

16 7. Attached to this declaration as Exhibit F are true and correct copies of
17 select excerpts of the transcript of the deposition of Robert Chamberlin, taken on May
18 21, 2018, and select exhibits referenced therein.

19 8. Attached to this declaration as Exhibit G are true and correct copies of
20 select excerpts of the transcript of the deposition of Carla R. Bean, taken on June 19,
21 2018, and select exhibits referenced therein.

22 9. Attached to this declaration as Exhibit H are true and correct copies of
23 select excerpts of the transcript of the deposition of Shauna Carter, taken on June 11,
24 2018, and select exhibits referenced therein.

25 10. Attached to this declaration as Exhibit I are true and correct copies of
26 select excerpts of the transcript of the deposition of Jean Robinson, taken on April 12,
27 2018, and select exhibits referenced therein.
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1 11. Attached to this declaration as Exhibit J are true and correct copies of
2 select excerpts of the transcript of the deposition of Elizabeth Goodman, taken on May
3 29, 2018, and select exhibits referenced therein.

4 12. Attached to this declaration as Exhibit K are true and correct copies of
5 select excerpts of the transcript of the deposition of Dan Woods, taken on April 23,
6 2018, and select exhibits referenced therein.

7 13. Attached to this declaration as Exhibit L are true and correct copies of
8 select excerpts of the transcript of the deposition of Sally Henderson, taken on June
9 12, 2018, and select exhibits referenced therein.

10 14. Attached to this declaration as Exhibit M are true and correct copies of
11 select excerpts of the transcript of the deposition of James Gibbons, taken on June 13,
12 2018, and select exhibits referenced therein.

13 15. Attached to this declaration as Exhibit N are true and correct copies of
14 select excerpts of the transcript of the deposition of Peggy Gritt, taken on June 1,
15 2018, and select exhibits referenced therein.

16 16. Attached to this declaration as Exhibit O are true and correct copies of
17 select excerpts of the transcript of the deposition of Gia Cedillo, taken on April 17,
18 2018, and select exhibits referenced therein.

19 17. Attached to this declaration as Exhibit P are true and correct copies of
20 select excerpts of the transcript of the deposition of Gene Ficarra, taken on June 8,
21 2018, and select exhibits referenced therein.

22 18. Attached to this declaration as Exhibit Q are true and correct copies of
23 select excerpts of the transcript of the deposition of Christopher Stream, taken on June
24 7, 2018, and select exhibits referenced therein.

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